

JRS:KRA
F. #2024R00256

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

RICHARD JONES,
also known as "Mula Rich,"

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

JENNA SEACOTT, being duly sworn, deposes and states that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, duly appointed according to law and acting as such.

On or about and between November 4, 2024, and March 6, 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RICHARD JONES, also known as "Mula Rich," together with others, not being a licensed importer, manufacturer, dealer, and collector of firearms, did knowingly and willfully engage in the business of dealing in firearms.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

COMPLAINT

(18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D), 2
and 3551 et seq.)

Case No. 25-MJ-75 (PK)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been since April 2023. I have participated in numerous investigations involving firearms trafficking and illegal firearm sales. Through my training, education, and experience, I have become familiar with the manner in which firearms are trafficked.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, my training and experience, and from reports of other law enforcement officers involved in the investigation. Unless specifically indicated, all conversations and statements described in the affidavit are set forth in sum and substance and in part.

3. The ATF has been investigating JONES for trafficking firearms into New York City. During this investigation, the ATF has worked with an individual ("Buyer"), whose identity is known to me, who has provided information to law enforcement concerning firearms purchases from JONES.²

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² Buyer is providing information to ATF in exchange for financial support. Buyer, who has a prior criminal conviction for criminal possession of a loaded firearm, has proven to be reliable in past investigations.

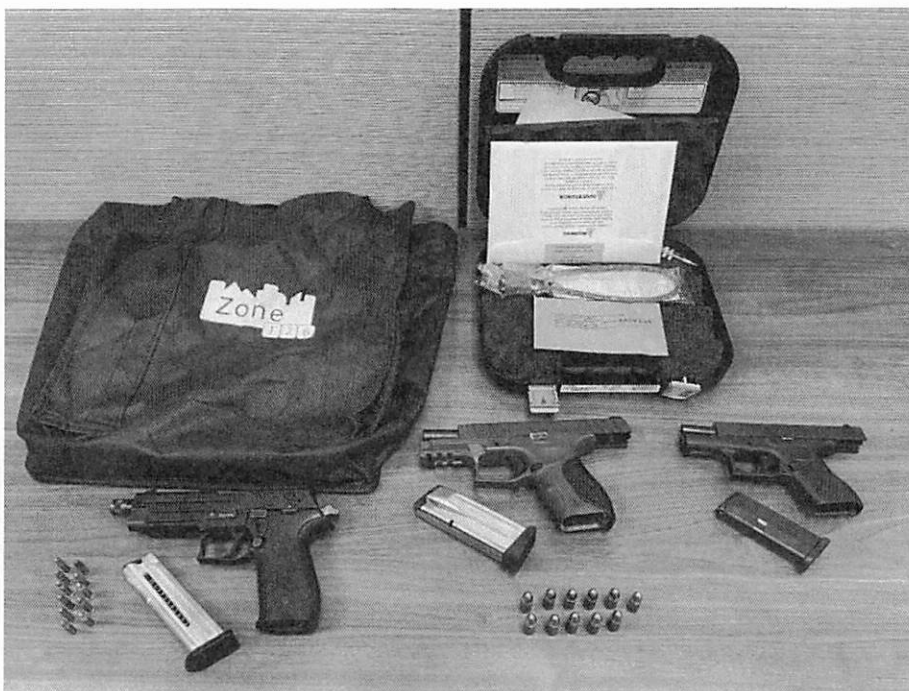
First Sale of Firearms: November 4, 2024

4. According to information provided by Buyer, as well as screenshots of text messages between Buyer and JONES,³ on or about and between October 31, 2024, and November 4, 2024, Buyer and JONES arranged for a sale of firearms. Specifically, Buyer agreed to purchase three firearms from JONES in exchange for \$4,500 at the corner of 21st Street and 40th Avenue in Long Island City, New York (the “Buy Location”).

5. On or about November 4, 2024, at approximately 4:22 p.m., law enforcement agents conducting surveillance of the Buy Location observed an individual consistent in appearance with JONES enter a vehicle driven by Buyer. As shown on a video recording of the transaction, the individual—whose appearance is consistent with images of JONES in law enforcement databases—handed Buyer a black reusable shopping bag and confirmed that “all three” firearms were inside. The individual also confirmed that “two of [the firearms] got food.” Based on my training and experience, I know that “food” is commonly used to reference ammunition. Buyer then handed the individual cash for payment, which the individual then counted before exiting the vehicle.

6. After the sale, Buyer provided the bag he received from the individual to law enforcement. I searched the bag and identified the firearms and ammunitions shown in the below photograph:

³ Buyer communicated with JONES at the phone number 770-256-6966, which, since October 16, 2024, has been subscribed to in the name “Mula Rich.” As described below, because the individual who appeared in person to conduct the buys arranged with the person using this phone appears to be JONES, I submit that this number is used by JONES.



7. The above recovered firearms and ammunition are identified as the following: one (1) Glock 42 .380 caliber pistol, serial number AASV234; one (1) Stoeger STR-9C 9mm caliber pistol, serial number T6429-21S05508;⁴ one (1) German Sports Guns Firefly .22LR caliber pistol, serial number F511144; eleven (11) rounds of assorted .22 caliber ammunition; and eleven (11) rounds of assorted 9mm caliber ammunition.

Second Sale of Firearms: November 18, 2024

8. According to information provided by Buyer, as well as screenshots of text messages between Buyer and JONES, on or about and between November 9, 2024, and November 18, 2024, Buyer and JONES arranged for another sale of firearms. Specifically, Buyer arranged to purchase another three firearms from JONES in exchange for \$4,500 at the Buy Location.

⁴ According to a National Crime Information Center Stolen Gun Report, a Stoeger STR-9C 9mm caliber with a serial number matching the one sold by JONES to Buyer was reported stolen in South Carolina in August 2022.

9. At or about 7:11 p.m. the same day, law enforcement agents conducting surveillance of the Buy Location observed the same individual who conducted the prior sale enter a vehicle driven by Buyer. As shown on video recording of the transaction, the individual handed Buyer what appeared to be a spotted bag.

10. After the sale, Buyer provided the bag he received from the individual to law enforcement. I searched the bag and identified the firearms and ammunition shown below:



11. The above recovered firearms and ammunition are identified as the following: one (1) Colt Detective Special .38 caliber revolver, serial number 936454; one (1) Rohm RG14 .22 caliber revolver, serial number 733138; one (1) Ruger 9E 9mm caliber pistol, serial number 335-42680; six (6) rounds of assorted .38 caliber ammunition; eight (8) rounds of assorted 9mm caliber ammunition; and twelve (12) rounds of assorted .38 caliber ammunition.

Third Sale of Firearms: February 15, 2025

12. According to information provided by Buyer, as well as screenshots of text messages between Buyer and JONES, on or about and between February 10, 2025, and February 14, 2025, Buyer and JONES arranged for another sale of firearms. JONES told Buyer, in sum and substance, that he was in Atlanta, Georgia, and would be traveling back to New York with firearms. Buyer arranged to purchase another two firearms from JONES in exchange for \$2,600 at the Buy Location.

13. On or about February 15, 2025, at approximately 1:00 p.m., law enforcement agents conducting surveillance of the Buy Location observed the same individual who conducted the prior sales enter a vehicle driven by Buyer. As shown on video recording of the transaction, the individual handed Buyer what appeared to be a black and gold bag, and Buyer handed the individual cash. The individual also told Buyer that he was “going out of town” and “got other orders” and asked Buyer “what kind of straps” Buyer preferred to purchase.

14. After the sale, Buyer provided the bag he received from the individual to law enforcement. I searched the bag and identified the firearms shown below:



15. The above recovered firearms are identified as the following: one (1) Taurus G3C 9mm caliber pistol, serial number ACN733232; and one (1) Taurus G2S 9mm caliber pistol, serial number AGL576593.

16. Pursuant to a judicially authorized search warrant, law enforcement obtained location information for a cellular device using the number that Buyer used to communicate with JONES. I and other ATF personnel analyzed this information, which revealed that the device traveled to Georgia and returned to New York in the period preceding each of the above-mentioned transactions.

Fourth Sale of Firearms: March 6, 2025

17. According to information provided by Buyer, as well as screenshots of text messages between Buyer and JONES, on or about and between March 2, 2025, and March 6, 2025, Buyer and JONES arranged for another sale of firearms. JONES told Buyer, in sum and substance, that he was “going down Tuesday myself” and would be bringing back “like 4-5 I got

one here already.” Specifically, Buyer arranged to purchase another four firearms from JONES in exchange for \$3,900.

18. On or about March 6, 2025, at approximately 4:15 p.m., law enforcement agents conducting surveillance of the Buy Location observed the same individual who conducted the prior sales enter a vehicle driven by Buyer. After the individual exited the vehicle, at approximately 4:30 p.m., he was placed under arrest and taken into custody.

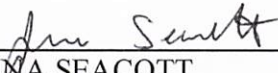
19. After the sale, Buyer provided a shoebox that he obtained from the individual to law enforcement. Law enforcement searched the box and identified the following firearms and ammunition:



20. The above recovered firearms are identified as the following: one (1) Walther Model PK380 .380 caliber pistol, serial number WB039565; one (1) Ruger Model LCP .380 caliber pistol, serial number: 379134450; one (1) Taurus Model G3 9mm pistol, serial number AAM120331; fifteen (15) rounds of Speer 9mm ammunition; and one (1) Taurus Model: G2S 9mm pistol, serial number AGL581535


21. Law enforcement officers have confirmed that JONES does not appear in ATF licensing databases.

WHEREFORE, your deponent respectfully requests that the defendant RICHARD JONES be dealt with according to law.



JENNA SEACOTT
Special Agent, Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me this ^{7th} 6th day of March, 2025



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK